Agenda ID #14095 Quasi-legislative

Decision	
Decision	

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's Own Motion to address the issue of customers' electric and natural gas service disconnection.

Rulemaking 10-02-005 (Filed February 4, 2010)

DECISION GRANTING COMPENSATION TO THE NATIONAL CONSUMER LAW CENTER FOR SUBSTANTIAL CONTRIBUTIONS TO DECISION 14-06-036

Intervenor: National Consumer Law Center (NCLC)	For contribution to Decision D.14-06-036
Claimed: \$20,367.08	Awarded: \$20,784.30
Assigned Commissioner: Michel Peter Florio	Assigned ALJ: Maryam Ebke

A. Brief description of Decision:	The Decision approves a Settlement among PG&E, SCE,			
A. Differ description of Decision.				
	SoCalGas and SDG&E and consumer groups that continues			
	some of the disconnection practices established in Docket			
	R.10-02-005. The Decision clarifies that, despite the			
	prescriptive nature of the payment pilot plans outlined in the			
	Settlement, there is room for individual considerations. The			
	Decision also notes that it is the Settling Parties' intent to			
	continue the permanent protections of D.12-03-054 of live			
	CARE enrollment and field visits before disconnections to			
	vulnerable and sensitive customers. In resolving the Joint			
	Motion for Settlement, the Decision denies Settling Parties'			
	request to modify two prior Orders (D.10-12-051 and			
	D.12-03-054) in this docket, and instead reopens the record			
	for the limited purpose of resolving the Joint Motion for			
	Settlement and related comments and filings.			
	Settlement and related comments and mings.			

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified				
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):						
1. Date of Prehearing Conference (PHC):	N/A					

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2. Other specified date for NOI:	3/6/2010	3/8/2010			
3. Date NOI filed:	3/5/2010	Yes			
4. Was the NOI timely filed?		Yes			
Showing of customer or customer	er-related status (§ 1802()	b)):			
5. Based on ALJ ruling issued in proceeding number:	R.10-02-005	Yes			
6. Date of ALJ ruling:	April 1, 2010	Yes			
7. Based on another CPUC determination (specify):					
8. Has the Intervenor demonstrated customer or customer-related status?					
Showing of "significant finance	:				
9. Based on ALJ ruling issued in proceeding number:	Yes				
10. Date of ALJ ruling:	April 1, 2010	Yes			
11. Based on another CPUC determination (specify):					
12. Has the Intervenor demonstrated significant financia	al hardship?	Yes			
Timely request for comp	pensation (§ 1804(c)):				
13. Identify Final Decision:	D.14-06-036	Yes			
14. Date of issuance of Final Order or Decision:	June 30, 2014	Yes			
15. File date of compensation request:	August 25, 2014	Yes			
16. Was the request for compensation timely?	Yes				

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
2		The OIR was dated February 4, 2010, but was issued on February 5, 2010. The NOI was due within 30 days of the date of issuance. (OIR, Ordering Paragraph 11.) Thirty days ran until Sunday, March 7, making the NOI due the next business day, Monday, March 8.

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059).

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Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
1. NCLC's participation helped clarify the record, establishing that the protection of a predisconnection site visit for vulnerable customers by a field representative continues to be permanent and is unaffected by the Settlement, despite lack of clarity in the Settlement terms.	D. 14-06-036 at 5 & Finding of Fact 6 ("The Settling Parties also confirmed their intent to continue the permanent provisions of D.12-03-054 related to field visits and immediate CARE enrollment."). NCLC Comments on Joint Motion for Settlement at 4-5 (without explicit clarification, one interpretation of Settlement is that it transforms permanent protections into temporary ones).	Yes
	NCLC Comments on Joint Motion for Settlement at Attachment 1 (in response to NCLC Data Request A, the Settling Parties clarify their intent to abide by D.12-03-054, the decision which establishes the permanent nature of these two protections, and their intent to abide by Paragraph 2(b) of D.12-03-054 which requires the field visit)	
	NCLC Response to Petition for Modification at 6-7 (noting that the Settling Parties' Petition to Modify D.12-03-054 attempts to delete Paragraph 2.b of that order, which provides the field visit protection, but that such change does not align with the stated intent of the parties)	
2. NCLC's participation helped clarify the record and establish that the requirement that CSRs offer live enrollment in CARE	D. 14-06-036 at 5 & Finding of Fact 6 ("The Settling Parties also confirmed their intent to continue the permanent provisions of D.12-03-054 related to	Yes

is a permanent protection that remains unaffected by the Settlement, despite lack of clarity Settlement terms.	field visits and immediate CARE enrollment."). NCLC Comments on Joint Motion for Settlement at 4-5 (without explicit clarification, one interpretation of Settlement is that it transforms permanent protections into temporary ones)	
	NCLC Comments on Joint Motion for Settlement at Attachment (in response to NCLC Data Request A, the Settling Parties clarify their intent to abide by D.12-03-054, the decision which establishes the permanent nature of the protection of live CSR assistance for CARE enrollment)	
3. NCLC demonstrated that the Petition to Modify D.10-12-051 is moot and should be denied.	D.14-06-036 at 13 (Conclusion of Law #5)	Yes
	NCLC Response to Petition for Modification at 7-8 (as the terms of the prior Settlement have expired, the request to modify the decision approving the prior Settlement at D.10-12-051 is moot).	
4. NCLC demonstrated that a preferable procedure to address the Joint Motion for Settlement (rather than modifying Commission Decisions D.10-12-051 and 12-03-054) was to reopen the record for the sole and limited purpose of	D.14-06-036 at 5 (Settling Parties agree with NCLC's procedural proposal), 9 (Commission agreeing with NCLC's recommendation to reopen record for sole purpose of considering the new Settlement Agreement and associated filings), 13 (Conclusion of Law #6)	Yes
receiving the Joint Motion for Settlement and related comments into the record, and issuance of a new Commission decision on whether to adopt the new Settlement.	NCLC Response to Petition for Modification at 4-5, 8-9 (recommending introduction of Settlement into record as new evidence to support a new order, independent of prior orders in this docket)	

5. NCLC contributed to enforcing the Commission-approved Settlement Provisions 4.1.2 and 4.1.3 for PG&E, SDG&E and SoCalGas, which require the utilities to set forth in tariffs a final opportunity for vulnerable customers to pay and in-person field visit prior to disconnection.

D.14-06-036 at 14 (Ordering Paragraph 2 directs utilities to each file a Tier 1 Advice Letter implementing changes required by the Settlement) & Attachment A (Settlement Provisions 4.1.2 and 4.1.3)

Compare PG&E Advice 3493-G/3352-E (July 2, 2014) with PG&E Advice 3493-G/4452-E (July 8, 2014) (adding sentence to Gas and Electric Rules 11).

Compare SDG&E AL 21616-E/2305-G (July 3, 2014) with Supplemental Advice Letter 2616-E-A/2305-G-A (July 10, 2014) (adding language to Gas and Electric Rules 11).

Compare SoCalGas AL 4665 (July 7, 2014) with Substitute Sheet for SoCalGas' AL 4665 (July 10, 2014) (adding sentence to Rule 9).

NCLC Timeslips at Attachment 2 (See entries for 7/3/2014 through 7/10/2014). NCLC obtained corrections and clarifications from the utilities regarding protections that had inadvertently been omitted from their tariff filings to comply with D.14-06-036. Although this enforcement activity occurred after the issuance of D.14-06-036, the enforcement of Commission-approved Settlement provisions should be found to "contribut[e] to the proceedings of the commission, as determined by the commission in its orders and decisions." Cal. Pub. Util. Code Sec. 1801.3(d). NCLC's activities that enforce the Commission-approved Settlement also constitute participation or presentation which substantially contributes to the adoption of the Settlement terms approved by D.14-06-036, in fact and in practice. See Cal. Pub. Util. Code Sec. 1803(a).

Yes

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding? ¹	Yes	Yes
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Yes
c. If so, provide name of other parties:		Yes
CforAT, Greenlining, and TURN were parties that shared pos NCLC's positions on a broad level.	sitions similar to	
d. Intervenor's claim of non-duplication:		Yes
Throughout these proceedings, NCLC has remained engaged with ORA and the other consumer groups. NCLC maintained communication with ORA, CforAT, Greenlining and TURN settlement discussions. When NCLC determined that it could the settlement, it continued to keep the consumer groups approxibation and procedural positions.		
NCLC's contributions for which it claims compensation were of other parties' efforts. NCLC's efforts to clarify the Settlem specifically, that the pre-existing protections of D.12-03-054 assistance for CARE enrollment and pre-disconnection field remotely disconnected vulnerable customers are not diminish Settlement – were successful and aided by NCLC's unique vi had a unique perspective as a non-signatory to the current Set comments on Settlement were informed by NCLC's great fan D.12-03-054 and the issues in this docket as an active party.		
When NCLC had concerns regarding whether the permanent D.12-03-054 were negatively affected by the draft Settlement duplication of efforts by first determining whether clarification parties was forthcoming. NCLC communicated with the constant the utilities by phone calls and during the Commission-most settlement conference. Only when NCLC found the Settling explanations did not fully address NCLC's concerns, did NCL and resources on developing its concerns for the written record Data Request on the Settling Parties and filing responses to the Parties' Joint Motion for Settlement and to the Petition for MD.10-12-051 and D.12-03-054.		

¹..The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

NCLC also drew upon its unique experience and expertise as a national consumer organization in this proceeding. In NCLC's perspective, a procedure to adopt the Settlement that leaves prior, sound, Commission decisions intact is preferable to modifying those decisions as requested by the Settling Parties. It helps to retain the integrity of those prior decisions as resources for best practice models for addressing the problem of disconnection of gas and energy service to low-income and payment-troubled customers. This perspective led to NCLC's recommendation of a procedural path to consider the Joint Motion for Settlement that was accepted by the other parties and adopted by the Commission.

NCLC's review of the tariffs, which were filed after Commission-approval of the Settlement, found that several corrections were necessary where there had been inadvertent omissions of the settlement obligation for an in-person, predisconnection field visit to vulnerable customers and/or final options for customer payment. To avoid duplication of efforts, NCLC informed the consumer groups of its communications with PG&E, SDG&E, and SoCalGas regarding NCLC's request that the utilities revise their tariff pages in accordance with Settlement terms. NCLC's communications with consumer groups ensured that duplicate efforts would not be necessary, as NCLC kept consumer groups aware of the substance of the discussions. As a result of NCLC's efforts, the necessary corrections were made in revised tariff page filings, to the benefit of sensitive and vulnerable consumers for three different utilities.

PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

a. Intervenor's claim of cost reasonableness: **CPUC Discussion** Yes NCLC filed Comments on the Settlement to clarify, on the record, the intent behind language in the Settlement. The result is that the Commission's order in D.14-06-036 clarifies the permanent, rather than negotiable nature of (1) the in-person field visit before remote disconnection and (2) a customer's opportunity to enroll in CARE using help from a live representative. The continuance of the live CARE enrollment obligation will help eligible customers enroll in CARE, assisting them in making more timely, affordable payments to their utility and avoid the costs of disconnection. The continuance of the predisconnection field visit ensures that sensitive and vulnerable customers will be afforded a premise check that may help avoid an untimely disconnection, and helps ensures that sensitive and vulnerable customers have an in-person opportunity to pay before disconnection. NCLC's efforts should help payment-troubled and vulnerable and sensitive

customers avoid the costs and inconveniences of premature and untimely disconnection.

Additionally, NCLC proactively suggested a simpler procedural path for the Commission's review of the Settlement, rather than the Petition for Modification of D.10-12-051 and D.12-03-054 offered by the Settling Parties. NCLC's recommendation was accepted by the Settling Parties and adopted by the Commission. This represents a savings in time and resources over that which may otherwise have been required to litigate the issue of Settling Parties' requests for modifications of two prior Commission orders. Further, keeping the prior Commission orders intact helps to avoid unnecessary confusion and expenditure of time and resources of consumer advocates and policymakers who seek to access the prior opinions as models of how to best assist low-income customers in lessening the risk disconnections.

NCLC attempted to avoid the costs of unnecessary responsive filings by first communicating its concerns about the draft Settlement with the consumer groups and utilities by phone and during the Commission-mandated settlement conference. Only when NCLC found oral explanations to be insufficient and it became clear that more explicit clarification on-the-record was necessary, did NCLC spend more extensive resources to participate in the late stages of this proceeding by submitting a Data Request and filing Comments on the Settlement and a Response to the Petition for Modification of D.10-12-051 and D.12-03-054.

NCLC's review of the utilities' tariffs that were filed in accordance with the Commission Order approving Settlement resulted in several corrections that benefit payment-troubled customers. The revised tariff language includes a pre-disconnection field visit to vulnerable customers and/or a final opportunity to pay, which had been inadvertently omitted from some of the filings. Customers of PG&E, SDG&E, and SoCalGas are ensured greater protection from premature disconnections for nonpayment as a result of NCLC's efforts to enforce the Settlement terms through the tariffs.

NCLC's requests a fair and reasonable rate for its lead attorney, Darlene R. Wong. Attorney Wong's experience includes practicing from 2001 to 2009 as an Assistant Consumer Advocate at the Pennsylvania Office of Consumer Advocate which focused exclusively on regulatory utility matters. From 2009 to the present, as Staff Attorney in NCLC's utilities group and in her role as consultant and Of Counsel to NCLC, she has continued to focus the vast majority of her practice on regulatory utility issues at state and national levels. The requested rate is reasonable, given Attorney Wong's length and nature of experience with regulated utility matters.

While it is difficult to assign a precise dollar value to the benefit to ratepayers

from NCLC's participation, NCLC's efforts have contributed to ensuring greater protection for customers, as described above. These protections should help customers make payments and avoid economic costs and inconveniences of disconnection. Additionally as described above, care has been taken to collaborate with other Consumer Groups to avoid duplication.

NCLC participated in meetings by teleconference, which also reduced participation costs that otherwise would have been incurred by travel.

b. Reasonableness of hours claimed:

Yes

Only after NCLC's attempt to obtain oral explanations from Settling Parties were unsatisfactory and it became clear that more explicit clarification on-the-record was necessary, did NCLC spend more extensive resources to participate in the late stages of this proceeding by submitting a Data Request and filing Comments on the Settlement and a Response to the Petition for Modification of D.10-12-051 and D.12-03-054.

Time was invested in this case by the managing attorney of NCLC's energy unit and NCLC's senior energy analyst; however, NCLC is not submitting a claim for their time. NCLC only claims the hours of its primary advocate on the case, Attorney Wong. Additionally, NCLC has voluntarily reduced the number of hours of participation by Attorney Wong for which NCLC claims compensation.

NCLC ultimately was not a signatory to the Settlement, but by arguing for even more flexibility in payment plan options, NCLC believes that its participation and input in Settlement negotiations contributed to obtaining attention to the need for flexibility in payment plans and pilot plans. *See* D.14-06-036 at 5 (The utilities have incorporated some level of flexibility into their pilot payment plan programs as set forth in Settlement Attachment A: Settlement Provisions 4.4.3.1, 4.4.3.2, 4.4.3.3 and 4.4.4.1, which all explicitly mention some level of "flexibility" in pilot payment plan); NCLC Timeslips at Attachment 2 (entries dated 9/20/13, 9/23/13, and 10/15/13 show time devoted to developing negotiation position for payment plans, including a form of payment plan pilot). However, NCLC has excluded 10.33 hours related to pilot and flexible payment plans from its compensation request to support a Commission finding of the reasonableness of NCLC's overall claim.

NCLC has documented in great detail the hours claimed in this filing and has drawn clear connections between the expenditure of its resources to the

positive outcomes for consumers in this case. The time and effort NCLC	
has expended has directly contributed to a Commission Order with	
provisions that provides substantial protection for low-income and	
payment-troubled customers. NCLC's efforts also directly contributed to	
the enforcement of the provisions of the Settlement that was approved by	
the Commission's Order.	
c. Allocation of hours by issue:	Yes
See Attachment 5 (NCLC Time Allocation by Issue)	

B. Specific Claim:*

CLAIMED					CPUC AW	/ARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Darlene Wong	2013	4.0	\$345	D.13-04-009 (approving rate of \$325/hour), together with NCLC's second request of a 5% "step increase" in the "8-12" years of experience compensation range, as authorized by D.07-01-009 and reaffirmed by ALJ-287. See Attachment 4 (Basis of Request for NCLC's Hourly Rates)	\$1,380.00	4.0	\$345	\$1,380.00
Darlene Wong	2014	49.16	\$345	Same justification as above for 2013 rate	16,960.20	49.16	\$355 ²	\$17,451.80
	•			Subtotal:	18,340.20		Subto	tal: \$18,831.80

 $[\]overline{\ }^2$ Application of 2.58% COLA per Resolution ALJ-303.

INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Darlene Wong	2014	11	\$172.50	½ requested regular hourly rate. See Attachment 4	\$2,026.88	11	\$177.50	\$1,952.50
Subtotal: \$2,026.88						Subt	otal: \$1,952.50	
TOTAL REQUEST: \$20,367.08					TO	OTAL AWAF	RD: \$20,784.30	

^{**}We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

^{**}Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate

ATTORNEY INFORMATION					
Attorney Date Admitted to CA BAR ³		Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation		
Darlene R. Wong	October 24, 2001 (PA); and March 17, 2009 (MA) ⁴	87381 (PA) 674514 (MA)	No (PA) No (MA)		

C. Attachments Documenting Specific Claim and Comments on Part III:

Attachment or Comment #	Description/Comment			
1	Certificate of Service			
2	Time Slips for NCLC's Attorneys and Expert Consultant			
	The following is a key to the codes used in Attachments 2 and 5:			
	COORD	Coordination - work related to coordination with other parties; conference calls, emails and correspondence on joint strategy, joint filings, allocation of issues, etc.		

³ This information may be obtained through the State Bar of California's website at http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch .

⁴ Attorney Wong is admitted to the Pennsylvania and Massachusetts bars; her initial rate for work performed before the California Public Utilities Commission was established by the Commission at \$300 in D.11-10-042, which recognized that Attorney Wong is not licensed in California. Since that initial fee setting decision, the Commission has granted a step increase and COLA adjustment to increase Attorney Wong's rate to the current hourly rate of \$325.

	GP	General Participation - work related to general participation/procedural/case management.			
	PD	Proposed Decision - work related to analysis, comments, coordination, and strategy pertaining to Proposed Decision's discussion of payment plans, deposits, outreach, remote disconnections, and data reporting when time spent was difficult to separate out into specific issue categories. Petition for Modification - work related to procedural and			
	PM	substantive arguments against Settling Parties' Petition to Modify D. 10-12-051 and D. 12-03-054.			
	PP	Payment Plans - work related to advocacy for option of longer, renegotiated and/or more flexible payment plans that maximize customer ability to pay. This work included discussion of pilot plans and levelized payment plans.			
	SET	Settlement - substantive work related to analysis, coordination, strategy, revisions and negotiations related to settlement, where separating time into more particular settlement issues is impractical or impossible.			
	SNV	Special Needs and Vulnerable Customers - work related to advocacy establishing special protection for vulnerable customers, including those with special needs such as seniors and the disabled, customers on Life Support or enrolled in Medical Baseline, and customers who self-certify that they have a serious illness/condition that could become life threatening with disconnection. This work included re-establishing permanent nature of the protections of (1) CARE enrollment assistance by a live representative and (2) a pre-disconnection in-person field visit, including when disconnection is performed remotely.			
	NCLC is noting its time spent on work related to pilot and flexible payment plans (however, NCLC voluntarily excludes these hours from its compensation claim to support a Commission finding of the reasonableness to NCLC's overall claim.				
3	Direct Expenses				
4	NCLC is claiming no direct expenses. Basis of Request for NCLC's Hourly Rates				
	NCLC believes that it has provided sufficient support for the requested rate for Attorney Wong under the Commission's adopted practices. However, if the Commission has any questions or concerns about this request, NCLC respectfully requests that it be given an opportunity to answer any questions and provide further support to its claim.				

PROPOSED DECISION

5	NCLC Time Allocation by Issue
	See description of Attachment 2 for applicable key to issue codes.
6	Preparation of Compensation Claim
	NCLC has voluntarily reduced the hours it is claiming for preparation of this claim to support a Commission finding of the reasonableness of NCLC's claim.
7	Verification

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

- 1. NCLC has made a substantial contribution to Decision (D.) 14-06-036.
- 2. The requested hourly rates for NCLC's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
- 3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
- 4. The total of reasonable compensation is \$20,784.30.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

- 1. National Consumer Law Center shall be awarded \$20,784.30.
- 2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall pay National Consumer Law Center their respective shares of the award, based on their California-jurisdictional electric and gas revenues for the 2014 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning November 8, 2014, the 75th day after the filing of National Consumer Law Center's request, and continuing until full payment is made.
- 3. The comment period for today's decision is waived.

 This decision is effective today.

Tills decision	is effective today.
Dated	, at San Francisco, California

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No	
Contribution Decision(s):	D1406036			
Proceeding(s):	R1002005			
Author:	ALJ Ebke			
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company			

Intervenor Information

Intervenor	Claim Amount		Amount	Multiplier?	Reason	
	Date	Requested	Awarded		Change/Disallowance	
National Consumer	8/25/2014	\$20,367.08	\$20,784.30	N/A	Resolution ALJ-303.	
Law Center						
(NCLC)						

Advocate Information

First Name	Last Name	Туре	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Darlene	Wong	Attorney	NCLC	\$345	2013	\$345
Darlene	Wong	Attorney	NCLC	\$345	2014	\$355

(END OF APPENDIX)